

1 THE HONORABLE TANA LIN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMANDA WASHBURN,

Plaintiff,

v.

PORSCHE CARS NORTH AMERICA, INC.,
a Delaware corporation,

Defendant.

No. 2:22-cv-01233-TL

**STIPULATION TO EXTEND THE
DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO THE
SECOND AMENDED COMPLAINT**

NOTE ON MOTION CALENDAR: MARCH
22, 2024

On March 11, 2024, Plaintiff Amanda Washburn (“Plaintiff”) filed her Second Amended Complaint (Dkt. 36) against Defendant Porsche Cars North America, Inc., (“Defendant”). Pursuant to Fed. R. Civ. P. 15(a)(3), Defendant’s answer to the Second Amended Complaint is currently due on March 25, 2024. By their respective counsel, the parties have stipulated to—and now jointly and respectfully request that the Court approve—a 30-day extension of the deadline for Defendant to file its answer or otherwise respond to the Second Amended Complaint to **April 24, 2024**. This stipulation is entered into between Plaintiff Amanda Washburn (“Plaintiff”) and Defendant Porsche Cars North America, Inc., (“Defendant” and together with Plaintiff, the “Parties”).

The Parties respectfully request this extension because additional time is needed to finalize and execute Parties’ Settlement Agreement, for the Parties to reach agreement on the content and form of the Settlement Class Notices and Claim Forms, and for Plaintiff to finalize and file her Motion for Preliminary Approval. The Parties continue to work diligently, as shown by their execution of a settlement term sheet and their agreement on the universe of Settlement Class

1 Vehicles, which resulted in the filing of Plaintiff's Second Amended Complaint. Since the last
2 extension request, the Parties have also been engaged with a prospective Claims Administrator
3 about the distribution of the Class Notices and Claim Forms. Those discussions remain ongoing
4 but are expected to be completed in the near future and before the requested response deadline.
5 The Parties likewise expect that Plaintiff will file her Motion for Preliminary Approval by the
6 requested deadline, April 24, 2024.

7 **IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties, through
8 their undersigned counsel, subject to the approval of the Court, to extend Defendant's deadline to
9 answer or otherwise respond to the Second Amended Complaint by 30 days to April 24, 2024.

10 Dated this 22nd day of March, 2024

11 TOUSLEY BRAIN STEPHENS PLLC

12 s/ Jason Dennett (with approval)

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22 *Attorney for Defendant Porsche Cars North America Inc.*

23 Attorneys for Plaintiff and the Putative Class

24 **ORDER**

25 IT IS SO ORDERED.

26 Dated this 22nd day of March, 2024.



Tana Lin
United States District Judge

STIPULATION TO EXTEND THE DEADLINE TO
ANSWER OR OTHERWISE RESPOND TO THE
SECOND AMENDED COMPLAINT - 2

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